

Exhibit 20

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

CASE NO.: 1:18-CV-191

Northstar Aviation, LLC, ET AL.,

Plaintiffs,

vs.

ALDEN BURT ALBERTO, ET AL.,

Defendants.

DEPOSITION OF AMY STYERS
PAGES 1 through 184

Monday, October 22, 2018
9:28 a.m. to 4:19 p.m.

U.S. Legal Support - Melbourne
100 Rialto Place
Suite 739
Melbourne, Florida 32901

Stenographically Reported By:
Vanese Killingbeck
Professional Reporter

1 Q. You can still answer.

2 A. I do.

3 Q. Did the subject matter relate to ITAR
4 provisions?

5 MR. FONTANEZ: Object. Attorney/client
6 privilege. You don't have to answer that question.

7 BY MR. FINDLEY:

8 Q. Did -- in that phone call, did anyone at
9 Akin Gump give Northstar legal advice?

10 MR. FONTANEZ: Same objection.

11 MR. FINDLEY: That's an instruction not to
12 answer?

13 MR. FONTANEZ: Yes.

14 MR. FINDLEY: I'm just asking what I can
15 learn on a privilege log that -- was there legal
16 advice given?

17 MR. FONTANEZ: You can -- you can answer. I
18 take that back. You can answer that question.

19 A. I believe there was legal advice given.

20 BY MR. FINDLEY:

21 Q. Did Northstar follow that legal advice?

22 MR. FONTANEZ: Objection.

23 MR. FINDLEY: But she can still answer,
24 right?

25 MR. FONTANEZ: Yes.

1 A. I don't -- I don't recall.

2 BY MR. FINDLEY:

3 Q. Do you recall whether Northstar rejected that
4 legal advice?

5 MR. FONTANEZ: Objection. You don't have to
6 answer that question.

7 MR. FINDLEY: You can -- but that's not an
8 instruction not to answer, right?

9 MR. FONTANEZ: Yes, it is.

10 MR. FINDLEY: I'm just clarifying whether
11 they followed or not.

12 MR. FONTANEZ: Right.

13 MR. FINDLEY: So I'm just kind of -- just
14 trying to make --

15 MR. FONTANEZ: We're given -- in the context,
16 we're given parameters of the legal advice based on
17 whether it was followed, whether it was not
18 followed. You know, those -- they can be deduced
19 as to what the legal advice was based on the --
20 based on your questions.

21 MR. FINDLEY: But that's not the same as
22 violating attorney/client privilege. I'm just
23 asking what they did after the call.

24 MR. FONTANEZ: Do --

25 MR. FINDLEY: And she already said she

1 Q. Now, in the next paragraph, it -- I think
2 you're offering your options now, right?

3 A. Correct.

4 Q. And it says, I just wanted to let you know
5 there is another option on this, if your name is removed,
6 we can notify DDTC that there was a material change in
7 registration (which includes changes in senior officers),
8 and add someone else whomever that might be. The
9 registration stays intact, however, the senior officer
10 name changes. I'm just throwing out options.

11 This is -- the letter you're referring to in
12 this -- or I'm sorry, that you attached is also an
13 option, right? All of these were different options that
14 Reno could have taken; is that correct, and you're just
15 adding some other ones?

16 A. Well, at this point Reno is asking the
17 state -- had asked me to draft a letter to the state
18 department invalidating the registration of
19 Northstar Aviation, which would effectively mean that the
20 company no longer has -- doesn't exist as far as the
21 state department is concerned. It can't export. It
22 can't provide any defense services or anything to its
23 customer. So the material change in registration, which
24 is another option through the state department, you can
25 notify them within five days of a change in senior

1 officer, and that removed -- that would have removed
2 Reno's name and kept everything with Northstar Aviation
3 in tact including licenses, the TAA and someone else's
4 name would have been placed and he would have not been
5 responsible for any activity under the TAA.

6 Q. What I'm asking, though, is that -- was the
7 option that is reflected in the letter that's attached to
8 your e-mail, Alberto -- bates No. Alberto_00880, is that
9 option wrong? Is there anything in that letter that you
10 think is -- is wrong or is it just another option?

11 A. Well, in my opinion, it's wrong because when
12 you do this, you take -- you put everybody out of a job,
13 and you take away everything that the state department
14 has authorized Northstar Aviation to do, it can no longer
15 do. So there would no longer -- you can't export. You
16 can't do anything under the ITAR when you ask to
17 invalidate a registration number. You don't exist.

18 Q. At the time that this letter was prepared, is
19 it -- was it -- strike that.

20 Was Reno necessary for Northstar USA to have
21 an ITAR license?

22 A. Reno himself?

23 Q. Yeah.

24 A. No.

25 Q. Was that clear to him at the time you were

1 Q. That second sentence in that paragraph, do
2 you see anything wrong with that statement?

3 A. Yes, because Northstar was still in business.

4 Q. Do you see anything wrong with that from an
5 ITAR perspective?

6 A. I've never been in this situation before, so
7 I can't speak one way or another.

8 Q. So it's a reasonable -- it could be a --
9 could have been a reasonable business decision to decide
10 not to be in the business of manufacturing, exporting, or
11 brokering defense articles or defense services?

12 A. I'm sure companies do it every day.

13 Q. The next sentence says, Northstar Aviation
14 USA, LLC, also requests that DDTC invalidate current
15 licenses held under registration M30941.

16 Is there anything wrong with that statement?

17 A. I've never been in this situation before, so
18 I can't -- I'm guessing companies do it all the time.

19 Q. Doing these things, meaning asking for DDTC
20 registration numbers to be expired and that current
21 licenses be invalidated, that's a business decision,
22 right?

23 A. It would have to be.

24 Q. The first sentence in the second paragraph
25 says, My power of attorney as chief executive officer of

1 contingency? I mean, wasn't the expectation on the part
2 of Northstar employees at that time that if a new company
3 was formed that they would become employees of the new
4 company?

5 MR. FONTANEZ: Objection.

6 BY MR. FINDLEY:

7 Q. You can answer that.

8 A. I can't speculate what my co-workers thought.

9 Q. Did Reno ever tell you that he was going to
10 take him with you to Vulcan?

11 A. He did.

12 Q. So isn't that the new company that would
13 replace Northstar when Northstar was shut down?

14 MR. FONTANEZ: Objection.

15 BY MR. FINDLEY:

16 Q. You can answer that.

17 A. That was me. I couldn't speak to what was
18 happening with the rest of my co-workers. Like I said, I
19 can't speculate what they were thinking. And I never
20 said I was going to his new company.

21 Q. No. But you had the opportunity to -- at
22 least Reno was telling you that if this new company,
23 Vulcan, was formed, you would have an opportunity to go
24 to that company, right?

25 A. If I wanted to.

CERTIFICATE OF OATH

STATE OF FLORIDA
COUNTY OF ORANGE

I, Vanese Killingbeck, Professional Reporter,
Notary Public, State of Florida, certify that
AMY STYERS personally appeared before me on the 22nd day
of October 2018 and was duly sworn.

Signed this 29th day of October 2018.

Vanese Killingbeck

Vanese Killingbeck
Notary Public, State Of Florida
Commission No: FF 187770
Commission Expires: January 13, 2019

CERTIFICATE OF REPORTER

STATE OF FLORIDA
COUNTY OF ORANGE

I, Vanese Killingbeck, Professional Reporter
and Notary Public, certify that I was authorized to and
did stenographically report the deposition of
AMY STYERS, pages 1 through 180; that a review of the
transcript was requested; and that the transcript is a
true record of my stenographic notes.

I further certify that I am not a relative,
employee, attorney, or counsel of any of the parties, nor
am I a relative or employee of any of the parties'
attorneys or counsel connected with the action, nor am I
financially interested in the action.

Dated this 29th day of October 2018.

Vanese Killingbeck

Vanese Killingbeck
Professional Court Reporter